## In the Supreme Court of the United States

VOLKSWAGEN GROUP OF AMERICA, INC., ET AL.,

Petitioners,

v.

THE ENVIRONMENTAL PROTECTION COMMISSION OF HILLSBOROUGH COUNTY, FLORIDA, AND SALT LAKE COUNTY, UTAH,

Respondents.

## CERTIFICATE OF COMPLIANCE

I, Nicole A. Saharsky, counsel for *Amici Curiae* and a member of the Bar of this Court, certify pursuant to Rule 33.1(h) of the Rules of this Court that this Brief for Product Liability Advisory Council, Inc. and Motor & Equipment Manufacturers Association As *Amici Curiae* In Support Of Petitioners contains 5,872 words, excluding the parts of the brief that are exempted by Rule 33.1(d).

Nicole A. Saharsky